

AUG 24 2011

**MEMORANDUM**

**SUBJECT:** Proposed Decision for No Corrective Action  
Safety-Kleen Systems, Incorporated  
9317 Woodend Road  
Edwardsville, KS 66111  
EPA ID No. KSD980973515

**FROM:** Kurt Limesand, AWMD/RCAP

**TO:** Lynn Slugantz, Branch Chief  
AWMD/RCAP

This memorandum summarizes a file review and analysis of the Safety-Kleen Systems, Incorporated (S-K) facility in Edwardsville, Kansas. The facility provided notification in 2002 that it was no longer a generator of hazardous wastes. S-K was assigned an NCAPS rank of low on January 28, 1990 and is on the 2020 RCRA Corrective Action Baseline. Based on the information in files maintained at EPA and at the Kansas Department of Health and Environment (KDHE), the facility does not appear to require any further corrective action at this time.

**Background and History**

The S-K facility began operation on April 11, 1985. The facility is located on a 1.38-acre site that is approximately one-third mile west of I-435 on Woodend Road. The site included one building with offices and a warehouse for storage, three aboveground storage tanks with concrete secondary containment, one loading dock with a solvent return and fill station and two dumpsters, and one enclosed shelter for container paint waste storage. This location was primarily a local sales/service office and warehouse for S-K products consisting of small parts cleaning equipment and solvent and allied products such as hand cleaner, floor cleaner, parts washing brushes, etc. S-K collected used solvents from customers for temporary storage at this facility. Once a sufficient quantity of materials was collected the materials were moved off site in a semi-trailer or tanker to an S-K Recycle Center. The customers were primarily facilities with a RCRA status of conditionally exempt small quantity generator (CESQG) or small quantity generator (SQG).

On June 7, 1985, S-K submitted a RCRA Part A permit application as a treatment, storage, and disposal (TSD) facility. The facility treated approximately 20 gallons per hour of K054, D001, and D002 wastes by incineration, stored 29,520 gallons of D001, D008, and F002-F005 wastes in containers, and stored 15,600 gallons of D001 wastes in tanks. A subsequent Notification of Hazardous Waste Activity submitted on June 10, 1985 identified the S-K facility as a hazardous waste storage facility and a transporter and generator of F001-F005 and D001 wastes.

Two aboveground tanks, for clean and spent solvent, had a capacity of 15,000 gallons each and a secondary containment area capacity of approximately 19,300 gallons. A third tank with a capacity of 8,000 gallons was installed later and was used to store additional mineral spirits product or waste oil.

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*L. Slugantz*  
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The two return and fill parts cleaner solvent dumpsters were completely emptied every 90 days and the dumpster sediment was drummed and stored in the drum storage area. The dumpsters were not permitted as regulated units. The return and fill station dumpsters had a secondary containment area capacity of 2,056 gallons. A subsequent Notification of Hazardous Waste Activity submitted on June 10, 1985 identified the S-K facility as a hazardous waste storage facility and a transporter and generator of F001-F005 and D001 wastes.

A RCRA Compliance Evaluation Inspection (CEI) conducted on August 8, 1986 found violations at the facility in regard to their operations as a transporter and generator of hazardous wastes. Violations were linked to security, general inspection requirements, personnel training, general requirements for characteristic wastes, access to communications and alarm, emergency coordinator, manifests, and emergency equipment.

On September 10, 1986 a formal request was made by KDHE for Part B of the RCRA permit application.

A RCRA Facility Assessment (RFA) was conducted by EPA's contractor in 1990 in anticipation of issuance of the Hazardous and Solid Waste Amendments (HSWA) portion of the RCRA permit for the facility. The RFA identified four solid waste management units (SWMUs): the warehouse drum storage area, the aboveground storage tanks (one containing recycled mineral spirits and the other containing spent mineral spirits), the paint waste metal storage shelter, and the solvent return and fill station dumpsters (two). The RFA determined that file information and visual inspection of the SWMUs provided no documentation or indication of releases from the units. All equipment was well-maintained, and all secondary containment was in good condition. No staining or other indications of releases were noted in or around the waste storage units or elsewhere throughout the facility during the on-site visual inspection.

On October 29, 1990 a RCRA permit for storage of hazardous wastes was issued to the Facility. Three RCRA-regulated units were permitted for storage of hazardous wastes: the 625-square foot indoor warehouse container storage area with secondary containment and collection trenches constructed of concrete with an impermeable coating; the enclosed, 300-square-foot sheet steel waste paint thinner storage shelter with a galvanized steel pan base for secondary containment; and the single, 15,000-gallon waste mineral spirit aboveground storage tank within an epoxy-coated concrete secondary containment basin. Based on the findings of the RFA, EPA elected to co-sign the permit with KDHE and have HSWA provisions incorporated into the State's RCRA permit. Those provisions consisted of notification of releases or newly identified SWMUs, land disposal restriction requirements, and waste minimization requirements. HSWA Corrective Action requirements were not included in the final permit.

A CEI conducted on May 20, 1992 found many violations at the facility. S-K was found to have been storing an excessive amount of waste and to have cracks in the secondary containment area, as well as other miscellaneous violations. S-K had the secondary containment area sandblasted, repaired, and recoated with an appropriate epoxy. All other violations were addressed by the facility but no testing was required. EPA files and RCRAInfo indicate that S-K has been in compliance since the CEI of May 17, 1993.

On July 8, 1993 S-K submitted a Notification of Hazardous Waste Activity that updated their list of wastes handled. S-K handled and/or generated F001-F005, U210, D001, D004-D008, D009-D011, D018, D019, D021-D030, and D032-D043 wastes.

S-K's permit expired on October 29, 2000 and closure was to be completed in 180 days. Modifications were made to the existing closure plan to allow the facility to leave the secondary containment structures for the tank farm and the container storage area in place. KDHE approved the modified closure plan on April 19, 2001.

Closure of the above ground waste solvent tank, two additional solvent product tanks, container storage area, return/fill station, and the paint waste shelter at the facility was certified by TriHydro Corporation on August 16, 2001. Closure consisted of detergent power washing, rinsing, inspection of containment areas, and the collection of rinsate and soil confirmation samples to verify the effectiveness of the decontamination procedures. Rinsate and soil samples were analyzed for appropriate unit-specific contaminants, and the analytical results from S-K's analytical laboratory indicated that no volatile or semi-volatile constituents were present in the rinsate and soil samples. Arsenic and vanadium were detected in soils at concentrations above KDHE's residential soil exposure screening levels, but were determined by KDHE to be attributable to natural background conditions in the area. Other metals were detected in soil verification samples at concentrations below the respective State of Kansas screening goals for those constituents in soil in a residential setting. KDHE's split sample results were in general agreement with the results provided by S-K's analytical laboratory; KDHE's lab had lower reporting limits, and did report several volatile and semi-volatile organic compounds, but all below EPA risk-based residential soil exposure screening levels. After review of the report, KDHE determined that S-K completed closure in accordance with the approved closure plan. KDHE accepted the closure certification on February 4, 2002. S-K indicated that the operations were being moved to an S-K facility in Independence, Missouri. The physical address is now occupied by a landscaping business that has not made notification as a generator of hazardous wastes.

#### Recommendation

Historical RCRA inspections did not identify any evidence of the release of hazardous constituents at this facility, and environmental sampling conducted at the time of closure verified that soils underlying the waste management units were not contaminated. The facility has been completely decommissioned. I recommend no further corrective action activities at this facility at this time.





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

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